

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE

FRANCISCO R. PIÑEIRO LOPEZ  
MARIA DE LOURDES ORTIZ BORIA

DEBTORS

CASE NO. 09-10517 BKT

CHAPTER 7

**MOTION FOR REOPENING OF CASE UNDER 11 U.S.C. §350(b)**

TO THE HONORABLE COURT:

COME NOW, FRANCISCO R. PIÑEIRO LOPEZ and MARIA DE LOURDES ORTIZ BORIA debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray:

1. On December 8, 2009, the debtors filed a petition for relief under Chapter 7 of Title 11, U.S. Code §§701 et seq., in the above captioned case.
2. The Court issued a Discharge Order, docket no. 17, and an Order discharging the Trustee and closing the present case, docket no. 19.
3. The above captioned case was classified as a “no asset” case and no distribution was made to creditors.
4. That due to a clerical error, debtors did not include certain creditor in their schedules, unsecured creditor, COOPERATIVA DE AHORRO Y CREDITO CAGUAS COOP a claim for approximately \$11,036.04, which debt was owed, fixed and liquidated prior to the date of the filing of the present case. Specifically, on September 2, 2010, unsecured creditor COOPERATIVA DE AHORRO Y CREDITO CAGUAS COOP filed a complaint for collection of money, against debtors, First Instance Court, Caguas, Puerto Rico, civil case no. EACI201003296401.

5. Under Section 350(b) of the Bankruptcy Code, 11 U.S.C. §350(b), a debtor may request by motion that the court reopen a case to accord relief to the debtor. 11 U.S.C. §350(b) and Rule 5010 of the Federal Rules of Bankruptcy Procedure. Local Rule 1009-1.

6. The debtors respectfully request the Court to reopen their bankruptcy case to allow them to file the appropriate amendments to Schedule “F” and Creditor Matrix, to include this creditor in the above captioned case.

### NOTICE

**Within twenty one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk’s office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.**

I CERTIFY that on this same date a copy of this motion was electronically filed using the CM/ ECF system which will send notification of same to: the Chapter 7 Trustee, Noreen Wiscovitch Rentas; US Trustee’s Office, Monsita Lecaroz, Esq., Assistant US Trustee; and via regular mail to: creditor, Cooperativa de Ahorro y Credito Caguas Coop; attorney for creditor, Jose A. Candelario Lajara; debtors, Francisco R. Piñeiro López and Maria De L. Ortiz Boria; and to all creditors and interested parties appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29<sup>th</sup> day of September, 2010.

/s/ Roberto Figueroa-Carrasquillo  
ROBERTO FIGUEROA-CARRASQUILLO  
USDC #203614  
ATTORNEY FOR PETITIONERS  
PO BOX 193677  
SAN JUAN PR 00919-3677  
TEL NO 787-744-7699 FAX NO 787-746-5294  
EMAIL: [rfigueroa@prtc.net](mailto:rfigueroa@prtc.net)

**PINEIRO LOPEZ, FRANCISCO RAMON**  
**HC 11 BOX 48528**  
**CAGUAS, PR 00725**

**JULIO R. CALDERIN**  
**PO BOX 21382**  
**SAN JUAN, PR 00928-1382**

**ORTIZ BORJA, MARIA DE LOURDES**  
**HC 11 BOX 48528**  
**CAGUAS, PR 00725**

**RELIABLE FINANCIAL SERVICES**  
**PO BOX 21382**  
**SAN JUAN, PR 00928-1382**

**R. Figueroa Carrasquillo**  
**Law Office**  
**PO Box 193677**  
**San Juan, PR 00919-3677**

**AEE**  
**PO BOX 363508**  
**SAN JUAN, PR 00936-3508**

**BANK OF AMERICA**  
**PO BOX 53132**  
**PHOENIX, AZ 85072-3132**

**COOP A/C ARECIBO**  
**BOX 1056**  
**ARECIBO, PR 00613**

**COOP A/C CAGUAS**  
**PO BOX 1252**  
**CAGUAS, PR 00726-1252**

**DPTO. DE TRANSPORTACION Y OBRAS**  
**PUBLICA**  
**PO BOX 11889**  
**SAN JUAN, PR 00922-1889**

**JOSE A CANDELARIO LAJARA**  
**VICK CENTER D407, 867 MUNOZ RIVERA**  
**AVE**  
**SAN JUAN, PR 00925**